

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DAVE SCARDINA, individually and on)	
behalf of a class,)	
)	No. 11-cv-03149
Plaintiff,)	
v.)	Judge George W. Lindberg
)	
MIDLAND CREDIT MANAGEMENT, INC;)	Magistrate Judge Jeffrey T. Gilbert
MIDLAND FUNDING LLC;)	
ENCORE CAPITAL GROUP, INC.,)	
)	
Defendant.)	

**DEFENDANTS' *CORRECTED* UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT**

Defendants Midland Credit Management, Inc., Midland Funding LLC, and Encore Capital Group, Inc. ("Defendants"), by their attorneys, Dykema Gossett PLLC, and for their Unopposed Motion for Extension of Time to Respond to Plaintiff's First Amended Complaint, state as follows:

1. On August 9, 2011, Plaintiff filed his Motion for Leave to Amend Complaint to Add Additional Count (Dkt. No. 40) which this Court granted on August 17, 2011. (Dkt. No. 42). Plaintiff's First Amended Complaint was filed on August 18, 2011. (Dkt. No. 43.) Thus, Defendants' responsive pleading is due on September 1, 2011.

2. Counsel for Defendants requires additional time to properly investigate the additional allegations and to formulate an appropriate response. On September 1, 2011, Defendants' counsel communicated with Plaintiff's counsel regarding this motion and Plaintiff's counsel does not oppose a short extension of time, through September 8, 2011, for Defendants to file their response to the First Amended Complaint.

3. Therefore, Defendants request additional time, up to and including September 8, 2011, to file their responsive pleading to Plaintiff's First Amended Complaint.

WHEREFORE, Defendants Midland Credit Management, Inc., Midland Funding LLC, and Encore Capital Group, Inc., respectfully request this Court grant an extension of time, up to and including September 8, 2011, to file their responsive pleading to Plaintiff's First Amended Complaint and for any other further relief this Court deems just and appropriate.

Dated: September 2, 2011

Respectfully submitted,

**MIDLAND CREDIT MANAGEMENT, INC.,
MIDLAND FUNDING, LLC, and ENCORE
CAPITAL GROUP, INC.**

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CERTIFICATE OF SERVICE

I hereby certify that on **September 2, 2011**, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

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s/ J. Richard Madamba

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